

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW MEXICO

In re:

KATHRYN R. ESQUIBEL,

Debtor.

Case No. 7-17-10498 JA

OBJECTION TO FEE APPLICATION

COME NOW Martin Lopez, III, PC (hereinafter “Objector”) by and through its undersigned counsel of record, and for its objection to the First Fee Application of Askew & White, LLC, (hereinafter “Applicant”) filed in the bankruptcy case on June 9, 2020, **STATES:**

1. Applicant filed proofs its application on June 9, 2020. Docket No. 139.
2. Applicant provided notice and an opportunity to object that same day.
3. A complex settlement in the case provides for the payment of Objector’s claim in full, either through Trustee distributions or directly from the Debtor.
4. Until the preparation of a final report it is difficult to assess how much the Trustee will be able to pay to creditors after payment of administrative expenses.
5. Objector concedes the hourly rates and expense rates are reasonable in the circumstances.
6. Objector concedes a large amount of work was necessary in the case, and the case was more complex and difficult than most Chapter 7 cases.
7. Objector nonetheless objects that the total compensation is not reasonable and necessary under the circumstances presented.

WHEREFORE Martin Lopez, III, PC prays the Court to deny the fee application filed by Askew and White, and for such other and further relief as the Court may deem just and proper.

Respectfully submitted

Filed electronically 6/30/20
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I hereby certify I sent a true and accurate copy of the foregoing to the following parties on June 30, 2020, either via regular mail or through the Court's electronic noticing system, depending upon the CM/ECF subscription status of the party in question.

Yvette J. Gonzales, Trustee
PO Box 1037
Placitas, NM 87043-1037

Askew & White, LLC
1122 Central Ave. SW #1
Albuquerque, NM 87102

Certified on 6/30/20
Michael K. Daniels